

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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PARADISE HOGAN and  
KAREN CHERELLI, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

THE INSTORE GROUP, LLC;

Defendant.

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C.A. No. 1:17-cv-10027

**JOINT REPORT CONCERNING THE SETTLEMENT ACCOUNT  
CREATED FOR THE PARTIES' CLASS SETTLEMENT**

On or about May 27, 2022, this Court granted final approval of a class action settlement in the above-captioned matter. In its order on that date, the Court directed Plaintiffs Paradise Hogan and Karen Cherelli and Defendant The InStore Group, LLC (collectively, the “Parties”) to file a report by November 3, 2022 that states the amount of any monies remaining in the settlement account as of the deadline for the Settlement Class to negotiate their distributions, including the amount of any unnegotiated distributions, and the estimated costs to distribute such remaining monies to the Settlement Class. The Court also scheduled the matter for further hearing on November 8, 2022 to determine whether it is cost effective to distribute the remaining monies on a pro rata basis to members of the Settlement Class who received the first distributions.

In compliance with that order, the Parties state as follows:

Deadline to Negotiate Distributions:                      October 6, 2022

Unnegotiated Distributions:                                      \$33,955.85

Cost to Distribute Unnegotiated Distributions:              \$0.00

Given the substantial amount of unnegotiated distributions remaining in the settlement account, and the fact that there is no additional cost to distribute those funds to the Settlement Class who received the first distributions, it is cost effective to distribute the remaining monies to them. Accordingly, the Parties respectfully propose that the Court order the following:

First, the fund administrator, Optime Administration LLC (“Optime”), shall distribute the unnegotiated distributions to the members of the Settlement Class who received the first distributions within 10 business days of this Court’s order;

Second, members of the Settlement Class who receive the second distribution shall have 90 days to negotiate them;

Third, Optime shall remit any unnegotiated second distributions remaining in the settlement account to the United States Treasury within 10 business days of the Settlement Class’s deadline to negotiate the second distributions; and

Fourth, the hearing scheduled on November 8, 2022 is canceled as unnecessary in light of the foregoing orders.

Respectfully submitted this 3rd day of November, 2022.

PLAINTIFFS

By their attorneys,

/s/ Brook S. Lane

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The InStore Group

By its attorneys,

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**CERTIFICATE OF SERVICE**

I, Brook S. Lane, hereby certify that on this 3rd day of November, 2022, the foregoing **JOINT REPORT** was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing and via first class mail to all non-registered participants identified on the Notice of Electronic Filing.

/s/ Brook S. Lane